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May 3, 2007

Ms. Camilla Reminsky  
Senior Campaign Finance Analyst  
Federal Election Commission  
Washington, DC 20463

Re: Focus on the Family Action,  
Identification No. C30000673

Dear Ms. Reminsky:

Thank you for speaking with me today. This is our response to your letter dated April 26<sup>th</sup>, requesting an explanation of the "substantial increase in the amount of receipts from those disclosed on your original notice." You indicated in our telephone conversation today that although the Amended 24 Hour Notice of Disbursements/Obligations for Electioneering Communication, dated 11/22/06, was acceptable to the Commission, you were requesting an explanation by letter of the reason why no donations were disclosed on the original 24 Hour Report.

The original 24 Hour Report disclosed no donations because of my advice to the client that since no donations were itemized on Schedule 9-A, the total on Line 9 should be reported as zero. I based this advice on the Instructions for FEC Form 9, which state:

LINE 9. Total Donations This Statement. *Provide the sum total of donations itemized on Schedule 9-A (emphasis added).*

I read this instruction literally and gave my advice based on it. Nothing in 11 CFR 104.20 is contrary to this interpretation.

However, you informed us in your letter dated November 7, 2006, that "The total amount of donations received should be listed on Line 9, *regardless of the itemization requirement*" (emphasis added). Based on your letter, we filed an Amended 24 Hour Report showing the total of un-itemized donations on Line 9, which you now acknowledge is acceptable to the Commission.

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